

EXHIBIT 12

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
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8 Thursday, December 13, 2018
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11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
12 CONFIDENTIALITY REVIEW
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15 Videotaped Deposition of JOLYNN
16 COLEMAN, held at 4206 South J.B. Hunt Drive,
17 Rogers, Arkansas, commencing at 8:15 a.m., on
18 the above date, before Debra A. Dibble,
19 Certified Court Reporter, Registered
20 Diplomate Reporter, Certified Realtime
21 Captioner, Certified Realtime Reporter and
22 Notary Public.
23
24
25

26 GOLKOW LITIGATION SERVICES
27 877.370.DEPS | fax 917.591.5672
28 deps@golkow.com
29
30

1 and Missouri, and in Texas.

2 Q. Okay. You graduated in 1986.

3 Have you gone back to graduate school?

4 A. I have not.

5 Q. Any certifications?

6 A. No.

7 Q. Additional training?

8 A. No.

9 Q. What did you do between 1986
10 and 1987?

11 A. I worked for K&B, which was a
12 regional chain in New Orleans, Louisiana, for
13 a year as a pharmacist.

14 Q. And how long did you stay at
15 K&B?

16 A. Right about a year.

17 Q. And what did you do then?

18 A. Moved -- transferred, and an
19 opportunity came up for a Walmart in my
20 hometown where I grew up, and I opened up a
21 pharmacy there for Walmart.

22 Q. So you joined Walmart in 1987?

23 A. Yes.

24 Q. And have you continued to work
25 for Walmart since 1987?

1 A. Yes, I have.

2 Q. You said you opened up a
3 pharmacy for Walmart.

4 Were you a dispensing
5 pharmacist?

6 A. Yes, I was.

7 Q. And how long were you a
8 dispensing pharmacist for Walmart?

9 A. Right about ten years.

10 Q. So approximately 1987 to 1997?

11 A. Approximately.

12 Q. What did you do after 1997?

13 A. Went into a market director
14 role, which was more of an oversight of
15 pharmacies across stores within a market. It
16 was about 12 to 15 stores in the central
17 Louisiana area.

18 Q. And how long were you in that
19 market director role?

20 A. About two years.

21 Q. Until 1999?

22 A. Yes.

23 Q. What position did you take in
24 1999?

25 A. I went to a general manager

1 position for our mail order pharmacy in
2 Carrollton, Texas. And I was there for
3 roughly six to seven years.

4 Q. Okay. So approximately
5 2005ish, 2006ish?

6 A. Yes.

7 Q. That's -- okay.

8 And when you left the position
9 as a general manager for the mail order
10 pharmacy group in Carrollton, Texas, what did
11 you do?

12 A. I went to the -- took an
13 opportunity to be a buyer for Walmart for Rx.
14 And stayed in that role for about six years.

15 Q. When you say you were "a buyer
16 for Walmart for Rx," do you mean you were a
17 buyer for the prescription buying group?

18 A. Yes.

19 Q. What were your responsibilities
20 as a buyer for Walmart?

21 A. My responsibilities were to
22 support the stores with inventory, work with
23 suppliers to get the best price possible on
24 the prescriptions, drugs that I purchased.
25 And just leverage relationships with those

1 Q. How did it change?

2 A. When the \$4 program launched,
3 as I had said earlier, I shifted to help with
4 generic purchases. And then, as we moved
5 into a different structure of the way we
6 bought products, we shifted to categories or
7 disease states. And then in that instance,
8 you would kind of oversee whatever drugs were
9 in that category; heart health, diabetes.

10 Q. Do you know whether the \$4
11 generic program included controlled
12 substances?

13 A. It did not.

14 Q. Do you know whether the \$9
15 program included?

16 A. To my knowledge, it did not.

17 Q. Okay. Was there a reason why
18 it wasn't included?

19 A. Just in general, in my career
20 with the company, we've never promoted
21 controlled substances to the customer or to a
22 physician.

23 Q. So the \$4 generic program was,
24 in your view, equivalent to a promotion for
25 those generic programs available at Walmart?